

UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:

THE HORNED DORSET PRIMAVERA, INC.

Debtor

CASE NO. 15-03837(ESL)

CHAPTER 11

MOTION FOR EXTENSION OF TIME TO
REPLY TO MOTION FOR ORDER TO SHOW CAUSE FOR
CONTEMPT FOR VIOLATION OF THE AUTOMATIC STAY

TO THE HONORABLE COURT:

COME NOW, Francisco J. Domenech Fernández and Verónica Ferraiuoli Hornedo ("Mr. and Mrs. Fernández"), through the undersigned counsel, and respectfully state and request:

1. On October 29, 2015, Debtor filed a "Motion for Order to Show Cause for Contempt for Violation of the Automatic Stay" (the "Motion"), with no response time indicated therein, alleging that Mr. Fernández, "[n]otwithstanding awareness of the filing of the petition and in clear and willful violation of the provisions of the section 362 of title 11 USC", "filed an amended complaint before the Commonwealth of Puerto Rico Telecommunication Regulatory Board on October 21, 2015" , as per Exhibit A to the Motion. (Docket No. 90).

2. On November 9, 2015, a hearing was scheduled for January 26, 2016 at 10:00 am, to consider the Motion (the "Hearing"). (Docket No. 96).

3. Mr. and Mrs. Fernández had been out of Puerto Rico and with limited communication. Moreover, Mr. Fernández had been hospitalized and thus, making it impossible for Mr. and Mrs. Fernández to meet with their counsel and provide the necessary information to respond to the allegations of the Motion.

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4. Since Mr. Fernández and Mrs. Ferraiouli returned to Puerto Rico last week, thirty (30) days are requested to answer the Motion, which will not interfere with the scheduled hearing.

WHEREFORE, it is respectfully requested that Mr. and Mrs. Fernández be granted thirty (30) days to file their reply to the Motion.

CERTIFICATE OF SERVICE: I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the Assistant US Trustee and to all CM/ECF participants.

San Juan, Puerto Rico, this 18th day of November, 2015.

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